IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

SAINT LAWRENCE COMMUNICATIONS LLC	§	Case No. 2:15-cv-00349-JRG
	§	(Lead Case)
Plaintiff,	§	
	§	Jury Trial Requested
V.	§	
	§	
ZTE CORPORATION, ZTE USA, INC.,	§	
And ZTE (TX) INC.,	§	
	§	
Defendants.	§	
	§	
SAINT LAWRENCE COMMUNICATIONS LLC	§	Case No. 2:15-cv-00351-JRG
	§	(Consolidated Case)
Plaintiff,	§	
	§	Jury Trial Requested
v.	§	
	§	
MOTOROLA MOBILITY LLC,	§	
	§	
Defendant.	§	

MOTOROLA MOBILITY LLC'S RULE 7.1 DISCLOSURE STATEMENT

Pursuant to Fed. R. Civ. P. 7.1, Defendant Motorola Mobility LLC makes the following disclosures:

- 1. Motorola Mobility LLC is, indirectly, a wholly-owned subsidiary of Lenovo Group Limited; accordingly Lenovo Group Limited has more than 10% ownership of Motorola Mobility LLC.
- 2. The following listed persons, associations of persons, firms, partnerships, corporations (including parent corporations) or other entities (i) have a financial interest in the subject matter in controversy or in a party to the proceeding, or (ii) have a non-

financial interest in that subject matter or in a party that could be substantially affected by the outcome of this proceeding: Lenovo Group Limited and Google Inc.

Dated: September 1, 2015 Respectfully submitted:

/s/ Joseph M. Drayton

Michael G. Rhodes (Lead Counsel) CA Bar No. 116127 Cooley LLP 101 California St., 5th Floor San Francisco, CA 94111-580 Tel: (415) 693-2000 Fax: (415) 693-2222

Email: rhodesmg@cooley.com

Joseph M. Drayton (*pro hac vice*) NY Bar No. 2875318 Cooley LLP The Grace Building 1114 Avenue of the Americas 46th Fl. New York, NY 10036-7798

Tel: 212-479-6000 Fax: 212-479-6275

Email: jdrayton@cooley.com

Rose S. Whelan DC Bar No. 999367 Cooley LLP 1299 Pennsylvania Ave NW Washington, DC 20004 Tel: (202) 842-7800 Fax: (202) 842-7899

Email: rwhelan@cooley.com

Deron R. Dacus Texas Bar No. 00790553 The Dacus Firm LLP 821 ESE Loop 323, Suite 430 Tyler, TX 75701 Tel: (903) 705-1117 Fax: (903) 581-2543 Email: ddacus@dacusfirm.com

Attorneys For Defendant Motorola Mobility LLC

CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this 1st day of September, 2015. All other counsel not deemed to have consented to service in such manner will be served via facsimile and/or first class mail.

/s/ Joseph M. Drayton